

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2021
Electric Procurement Revenue Requirement
Forecasts and GHG-Related Forecasts

Application 20-04-014
(Filed April 15, 2020)

SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902-E)
NOVEMBER UPDATE TO APPLICATION

*****REDACTED – PUBLIC VERSION*****

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November 6, 2020

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OF THE STATE OF CALIFORNIA**

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NOVEMBER UPDATE TO APPLICATION**

I. INTRODUCTION

On April 15, 2020, San Diego Gas & Electric Company (“SDG&E”) submitted its Application for Approval of its 2021 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”).¹ In November of each year, SDG&E updates certain information in the testimony supporting its forecast application using data that was not available at the time it submitted its application (“November Update”). Consistent with that practice, and per the July 6, 2020 Scoping Memo and Ruling of Assigned Commissioner, SDG&E hereby submits its November Update, which consists of updated information sponsored by several SDG&E witnesses.

II. BACKGROUND

In the Application, SDG&E requested approval of its 2021 forecast of (1) the Energy Resource Recovery Account (“ERRA”) revenue requirement, which includes greenhouse gas (“GHG”) costs; (2) the Portfolio Allocation Balancing Account (“PABA”) revenue requirement; (3) the Competition Transition Charge (“CTC”) revenue requirement tracked in the Transition

¹ SDG&E subsequently filed an *Amended* Application on April 20, 2020 to correct language regarding the rate and bill impacts resulting from SDG&E’s forecasted revenue requirements. For purposes of this brief, all references to “Application” shall mean the April 20th Amended Application.

Cost Balancing Account (“TCBA”);² (4) the Local Generation (“LG”) revenue requirement tracked in the Local Generating Balancing Account (“LGBA”);³ (5) the San Onofre Nuclear Generating Station (“SONGS”) Unit 1 Offsite Spent Fuel Storage Cost revenue requirement tracked in SDG&E’s Nuclear Decommissioning Adjustment Mechanism (“NDAM”) account; (6) the Tree Mortality Non-Bypassable Charge (“TMNBC”) revenue requirement; and (7) the GHG allowance revenues and return allocations. SDG&E also requests authorization to return the overcollected 2018 balance recorded to the LGBA. Lastly, SDG&E requests approval for its proposed 2021 (1) GHG Allowance Return rates; (2) vintage Power Charge Indifference Adjustment (“PCIA”) rates; and (3) rate components for the Green Tariff Shared Renewables (“GTSR”) Program. SDG&E’s Application was supported by the testimony of six witnesses. SDG&E requested approval of its Application for recovery in rates beginning January 1, 2021.

In November of each year, SDG&E updates the testimony it submitted earlier in the year with its April Application. The November Update has traditionally served to update testimony regarding the CTC Market Price Benchmark (“MPB”) and the PCIA benchmarks. This information is provided to SDG&E by the Commission’s Energy Division, which compiles and provides updated input assumptions to the investor-owned utilities (“IOU”) so that the MPB can be calculated. These assumptions typically do not become available until early November, as they include forward price curves for all the trading days in October.

Other updates to the ERRRA testimony are warranted since approximately six months have passed since the filing of the Application, and various input assumptions have changed,

² The purpose of the TCBA is to accrue all the CTC revenues and recover all CTC-eligible generation-related costs.

³ The purpose of the LGBA is to record revenues and costs of generation and other energy sources where the Commission has determined that the resource is subject to the Cost Allocation Mechanism (“CAM”).

including with respect to gas, electric and GHG forward price curves; the departed load forecast; and Power Purchase Agreement contract terms and projected operations. These updates result in changes to forecasted ERRA, PABA, CTC and LG expenses and GHG quantities and expenses.

SDG&E has also made several additional updates based on Commission decisions or other relevant information that has become available since the submission of the Application. In Decision (“D.”) 19-10-001, the Commission directed utilities to use vintage-billing determinants for calculating PCIA rates, calculate true-ups based on the updated MPBs provided by the Energy Division for PABA costs, and include in the ERRA Forecast November Update any under or over-collected balance associated with PABA. In AL-3318-E, the Commission approved the establishment of PABA to record PCIA revenues and expenses.

In accordance with Ordering Paragraph 11 of D.14-10-033, in which the Commission directed utilities to provide a fourth quarter update to its GHG forecast revenue and reconciliation request no later than November 15 of each year, SDG&E is providing its 2019 GHG Allowance Revenue and Expenses Reconciliation. This process consists of updating the 2020 recorded data to include actual revenues and estimated expenses from January through September 2020 and forecasted revenues and expenses from October through December 2020. Templates D-1 to D-5 of **Attachment G** to the Application have been updated accordingly, as SDG&E indicated it would do when it filed the Application. *See Appendix G*, attached hereto.

As required by Commission decisions in Application (“A.”) 13-08-002, annual GHG forecast applications (now incorporated into the ERRA forecast filing) include reconciliation of prior years. These prior years are unaffected by changes to the MPB, but volumetric changes to SDG&E’s 2019 GHG emissions, as well as changes to current year emissions, purchases and sales, have led to modifications to 2019-2020 GHG data, as further explained in the testimony of

Scott Lewis. Final verification of annual emissions takes place August of the following year. The 2019 emission volumes became final in August 2020 and both the 2019 volumes and costs have thus changed since the Application was submitted.

In addition, on April 23, 2020, the Commission issued D.20-04-012 which continues authorization of allocation funds to the Solar on Multifamily Affordable Housing (“SOMAH”) Program through 2026. At the time SDG&E filed its Application, it was not able to include the SOMAH funding request as the Commission had not yet issued its decision for Rulemaking 14-07-002 and Application 16-07-015 extending the SOMAH program funding. SDG&E updates its SOMAH funding request in this November Update. SDG&E also includes a true-up of its prior year’s authorized SOMAH set-aside amount as required by D.20-04-012.⁴

Finally, on October 8, 2020, the Commission approved D.20-10-002 directing the utilities to continue to distribute GHG allowance proceeds, inclusive of interest, resulting from the consignment of the assigned allowances allocated to the utilities by the California Air Resources Board (“CARB”) to auction, in the same manner as previously directed in D.12-12-033, D.13-12-002, and D.14-12-037 (as modified by D.15-08-006 and D.16-07-007).⁵ Specifically, D.20-10-002 concludes that the Industry Assistance Factor for the Small Business Climate Credit adopted in Decision 13-12-002 remains at 50 percent for the year 2021.⁶ With respect to the California Industry Assistance Credit for large EITE entities, D.20-10-002 extends the existing

⁴ D.20-04-012 at p. 10.

⁵ D.20-10-002 at Ordering Paragraph (“OP”) 1

⁶ *Id.* at OP 2.

formulas until CARB begins the process of providing assistance or the Commission directs further changes.⁷

III. SUMMARY OF UPDATES TO THE APPLICATION

In its Application, SDG&E sought approval of a total 2021 forecasted revenue requirement of \$920.317 million. In this November Update, SDG&E seeks approval of its *updated* total 2021 forecasted revenue requirement of \$1,161.437 million, which is comprised of several forecasts of specific items.⁸ Table 1 below reflects SDG&E’s proposed changes to the forecasts set forth in the April Application:

TABLE 1 – 2021 Revenue Requirement Forecasts

Forecast	April 20, 2020 Application	November 6, 2020 Update
ERRA revenue requirement	\$604.409 million	\$663.435 million
PABA revenue requirement	\$373.828 million	\$332.469 million
CTC revenue requirement	\$16.673 million	\$11.401 million
LG revenue requirement	\$137.895 million	\$124.439 million
SONGS Unit 1 Offsite Spent Fuel Storage Cost revenue requirement	\$1.073 million	\$1.073 million
TMNBC revenue requirement	Confidential – <i>See</i> Testimony of Khoang Ngo	Confidential – <i>See</i> Testimony of Khoang Ngo
GHG allowance revenue return allocations	\$0 million for EITE customers	\$(0.839) million for EITE customers
	\$0 million for small businesses	\$(1.657) million for small businesses

⁷ *Id.* at p. 2.

⁸ This forecasted revenue requirement includes Franchise Fees and Uncollectibles (“FF&U”). SDG&E is also requesting approval of its 2021 TMNBC revenue requirement, which is set forth in the Updated Testimony of Khoang T. Ngo and confidentiality declaration attached thereto. SDG&E omitted the 2021 TMNBC revenue requirement figures from the text of this November Update due to confidentiality concerns. As explained below and in the Updated Testimony of Ms. Ngo, since the revenue requirement associated with the TMNBC will be collected via the Public Purpose Program (“PPP”) charge, it is not included in this total.

	\$(122.477) million for residential California Climate Credit	\$(93.536) million for residential California Climate Credit
PABA Balance	\$0	\$123.812 million
LGBA Overcollection	\$(91.084) million	\$0 ⁹
Total 2021 forecasted revenue requirement	\$920.317 million	\$1,161.437 million

In its Application, SDG&E also sought approval of certain forecasts used to calculate GHG allowance revenue return allocations. In this November Update, SDG&E has proposed certain changes to those forecasts, as reflected in Table 2 below:

TABLE 2 – 2021 GHG Revenue and Expense Forecasts

Forecast	April 20, 2020 Application	November 6, 2020 Update
GHG allowance revenues	\$121.114 million	\$115.836 million
GHG allowance revenue set aside for clean energy/energy efficiency programs	\$1.03 million	\$17.774 million
GHG administration, customer outreach and outreach plan costs	\$0.059 million	\$0.045 million

In its Application, SDG&E also compared the 2021 revenue requirement forecasts against the amounts that were currently effective in rates at that time and concluded that there was a combined total decrease of \$574.866 million. In total, these changes would decrease the current system average bundled rate by 2.696 cents per kilowatt hour, or 11.24%. Based on those numbers, SDG&E projected that a typical bundled non-CARE residential customer in the inland climate zone using 400 kilowatt hours could see a monthly summer bill decrease of 8.5%,

⁹ As explained in the Updated Testimony of Khoang T. Ngo, the amount of the LGBA Overcollection is subject to approval in SDG&E's Record Year 2018 ERRR Compliance Application (A.19-05-007). As of the filing of this November Update, the Commission has not issued a decision in that proceeding. Accordingly, SDG&E is removing its request to return LGBA activity in the amount of \$(91.08) million from this 2021 ERRR Forecast Application. Instead, SDG&E will seek the return of LGBA overcollection in its 2022 ERRR Forecast Application.

or \$10.13. Based on those numbers, SDG&E projected that a typical bundled non-CARE residential customer in the inland climate zone using 400 kilowatt hours could see a monthly winter bill decrease of 9.2%, or \$9.95.

Based on this November Update, SDG&E projects a combined total decrease of \$334.173 million compared to the currently effective rates. In total, these changes would decrease the current system average bundled rate by 2.964 cents per kilowatt hour, or 12.35%. Based on these numbers, SDG&E projects that a typical bundled non-CARE residential customer in the inland climate zone using 400 kilowatt hours could see a monthly summer bill decrease of 9.91%, or \$11.07. Based on these numbers, SDG&E projects that a typical bundled non-CARE residential customer in the inland climate zone using 400 kilowatt hours could see a monthly winter bill decrease of 9.71%, or \$10.91.

IV. SUPPORTING TESTIMONY

This November Update includes the testimony of six SDG&E witnesses. Each witness has prepared a markup (served concurrently herewith) of their original April 2020 testimony, in which updates are reflected in a redline format. Those witnesses (and summaries of the updates they performed) are as follows:

A. Mr. Stefan Covic

Mr. Covic updates SDG&E's 2021 forecast of the procurement costs that it expects to record to the ERRA, TCBA, PABA and LGBA, as well as procurement costs related to the Green Tariff Shared Renewables program in 2021. In addition, Mr. Covic provides an update to the forecast of the SONGS Unit 1 Offsite Spent Fuel Storage Costs. Mr. Covic also updates SDG&E's forecast of 2021 total GHG costs – both direct and indirect – incurred in connection with SDG&E's compliance with California's cap-and-trade program, which Ms. Ngo uses in her 2021 forecast of the ERRA revenue requirement. Additionally, Mr. Covic provides an updated

forecast of GHG allowance revenues, and the amount of revenue available for energy efficiency and clean energy investments in 2021. Mr. Covic also provides an updated forecast of Tree Mortality Non-Bypassable Charge Balancing Account (“TMNBC”) costs. Lastly, Mr. Covic’s updated testimony supports Ms. Fuhrer’s development of the GHG allowance revenue return allocation and the volumetric revenue return for small business and residential customers, the GTSR program, and the PCIA.

B. Ms. Khoang Ngo

Based on updated forecasts provided by Mr. Covic, Ms. Ngo updates SDG&E’s 2021 forecast of (1) the ERRA revenue requirement, which includes GHG costs; (2) the CTC revenue requirement; (3) the LG revenue requirement; (4) TMNBC revenue requirement; and (5) PABA revenue requirement and the year-end forecasted 2020 PABA under collection balance. Ms. Ngo also compares SDG&E’s 2019 year-end balances with the actual 2019 year-end balances in the GHG allowance revenues and expenses balancing accounts, as well as reconciliation of the 2020 GHG Allowance Revenue & Expenses. Lastly, Ms. Ngo’s testimony requests authorization of the revenue requirement of the SONGS Unit 1 Offsite Spent Fuel Storage costs.

C. Ms. Stacy Fuhrer

Based on the updated revenue requirements provided by Ms. Ngo, Ms. Fuhrer updates the rate impacts associated with the ERRA, PABA, CTC, LG, SONGS revenue requirements as well as the GHG allowance revenue return and sum of the activity in the LGBA. Based on 2021 Energy Division input factors that recently became available, Ms. Fuhrer updates the CTC and PCIA rates. Ms. Fuhrer also calculates the above-cap portion of departed load’s PCIA rates and the revenue requirement associated with the above-cap portion, which will be tracked in the PCIA under-collection balancing account (“CAPBA”). Ms. Fuhrer also updates the 2020 allowance revenue return based on updated information provided by Mr. Covic. Ms. Fuhrer also

updates the 2021 rate components associated with the Green Tariff (“GT”) and Enhanced Community Renewables (“ECR”) programs.

D. Mr. Scott Lewis

Mr. Scott Lewis provides an update to Ms. Garza-Beutz’s April testimony.¹⁰ Mr. Lewis’s testimony updates revenues and costs for GHG compliance instruments to satisfy SDG&E’s 2019-2020 compliance obligations under the cap-and-trade program. These updates are based on D.14-10-33 where utilities are given direction to report GHG information for “any years for which it is recording or reconciling costs and revenues” in addition to the forecast year. Mr. Lewis’ testimony also includes SDG&E’s 2019-2020 revenues related to the sale of its allowance allocation.

E. Ms. Sheri Miller

Ms. Sheri Miller provides an update to Ms. Chihwaro’s April testimony.¹¹ Ms. Miller’s testimony updates the recorded GHG Compliance Instrument costs expensed in the ERRA balancing account to reflect the actual GHG emissions (which are described in the testimony of Mr. Lewis) and WAC by compliance period, in accordance with D.19-04-016. Ms. Miller’s testimony also includes SDG&E’s Weighted Average Cost (“WAC”) calculation for 2019 and January – September 2020. The included WAC utilizes the methodology as required by D.14-10-033, subsequently corrected in D.14-10-055, D.15-01-024 and D.19-04-016. Based on the WAC calculations, Ms. Miller updated the GHG emissions expense to satisfy SDG&E’s 2019-2020 compliance obligations under the cap-and-trade program.

¹⁰ Mr. Lewis adopts Ms. Garza-Beutz’s prior April testimony as his own.

¹¹ Ms. Miller adopts Ms. Chihwaro’s prior April testimony as her own.

F. Ms. April Bernhardt

Ms. Bernhardt updates the projected ongoing education and outreach costs related to the crediting of GHG allowance revenues on customers' bills in the year 2021.

V. CONFIDENTIALITY

Along with its original Prepared Direct Testimony, SDG&E submitted declarations attesting to the confidentiality of data presented therein. SDG&E requested that the confidential information in its Prepared Direct Testimony be kept confidential pursuant to Public Utilities Code §§ 583, 454.5(g), D.06-06-066, D.08-04-033, and D.14-10-033, as identified in SDG&E's confidentiality matrix. This November Update contains confidential information that is identified in SDG&E's confidentiality matrix and covered by declarations, which are being submitted with the respective Updated Prepared Direct Testimony. SDG&E requests that the same confidential treatment requested with the original filing apply to the information marked confidential in this November Update.

VI. CONCLUSION

SDG&E respectfully requests that the Commission approve the forecasts and proposals in its Application (Application at pp. 3-5 & 25-26), subject to the updates contained in this November Update.

Respectfully submitted,

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November 6, 2020

UPDATED ATTACHMENT G

GHG REVENUE AND RECONCILIATION FORM
(Attachment D of Decisions D.14-10-033 and D.15-01-024)

GHG Revenue and Reconciliation Application Form

Notes:

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Appendix D of the Proposed Decision mailed 9/12/14 in A.13-08-002 et al. Appendix D provides specific information on reporting methodology and confidentiality treatment of data.

Gray shading indicates confidential information. However, additional information may be confidential based on a utility's particular circumstances.

For Template D-4, each utility must provide the data in spreadsheet format, but may modify the template as appropriate to present the requested information by rate schedule.

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line Description	2013		2014		2015		2016		2017		2018		2019		2020		2021	
	Forecast	Recorded	Forecast ¹	Recorded	Forecast ¹	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded
1 Proxy GHG Price (\$/MT)	-	-	N/A	-	N/A	12.09	13.13	N/A	13.23	N/A	15.63	N/A	16.35	N/A	18.29	N/A	17.12	N/A
2 Allocated Allowances (MT)	6,919,341	6,919,341	6,549,142	6,549,142	6,426,430	6,426,430	6,406,805	6,406,805	6,460,042	6,460,042	6,288,321	6,288,321	6,186,936	6,186,937	6,143,946	6,143,947	6,766,147	N/A
3 Revenues																		
4 Prior Balance	N/A	N/A	(\$102,074,500)	(\$82,503,131)	(\$19,755,324)	(\$18,393,131)	(\$31,586,221)	(\$31,892,368)	(\$3,775,309)	\$4,334,942	(\$4,295,169)	(\$6,529,128)	(\$686,192)	\$3,734,063	\$1,310,790	\$325,486	\$3,172,937	N/A
5 Allowance Revenue	(\$103,302,000)	(\$82,413,505)	(\$94,570,000)	(\$76,756,698)	(\$77,695,500)	(\$79,929,234)	(\$84,121,350)	(\$81,556,638)	(\$86,466,355)	(\$92,529,677)	(\$98,286,457)	(\$93,727,555)	(\$101,156,404)	(\$104,156,909)	(\$112,372,776)	(\$106,782,171)	(\$115,836,437)	N/A
6 Interest	\$0	(\$49,826)	(\$28,773)	(\$47,003)	(\$76,463)	\$24,203	\$24,796	\$31,893	\$96,837	\$65,817	\$91,282	\$143,250	\$251,035	\$236,629	\$136,079	\$31,992	\$2,372	N/A
7 Franchise Fees and Uncollectibles	\$0	\$0	(\$1,771,359)	(\$1,706,341)	(\$1,190,048)	(\$1,581,513)	(\$1,026,495)	(\$661,789)	(\$1,013,589)	(\$991,175)	(\$1,066,881)	(\$1,135,547)	(\$1,061,344)	(\$1,056,581)	(\$1,188,148)	(\$1,070,218)	(\$1,189,180)	N/A
8 Subtotal Revenues	(\$103,302,000)	(\$82,503,131)	(\$198,444,632)	(\$181,013,172)	(\$98,717,335)	(\$98,879,665)	(\$53,336,818)	(\$50,176,135)	(\$82,607,777)	(\$89,129,994)	(\$103,557,235)	(\$101,246,980)	(\$102,632,905)	(\$101,242,797)	(\$112,114,055)	(\$107,894,911)	(\$113,850,308)	N/A
9 Expenses																		
10 Outreach and Administrative Expenses ²	\$1,227,500	\$0	\$187,500	\$801,369	\$134,835	\$134,989	\$80,036	\$80,994	(\$2,063)	(\$369)	\$48,461	\$52,210	(\$135,316)	(\$134,042)	\$29,021	\$29,255	\$45,133	N/A
11 Franchise Fees and Uncollectibles	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A
12 Interest	\$0	\$0	\$0	(\$115)	\$0	(\$134)	\$0	(\$958)	\$0	(\$1,694)	\$0	(\$3,747)	\$0	\$0	(\$1,274)	\$0	(\$234)	N/A
13 Subtotal Expenses	\$1,227,500	\$0	\$187,500	\$801,250	\$134,835	\$134,835	\$80,036	\$80,036	(\$2,063)	(\$2,063)	\$48,461	\$48,461	(\$135,316)	(\$135,316)	\$29,021	\$29,021	\$45,133	N/A
14 Allowance Revenue Approved for Clean Energy or Energy Efficiency Program ³	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,300,000	\$10,300,000	\$10,649,840	\$10,649,840	\$14,375,803	\$13,361,289	\$17,775,708	N/A
14a SOMAH (Current Year + Request)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,300,000	\$10,300,000	\$10,115,640	\$10,115,640	\$11,237,278	\$5,618,639	\$11,583,644	N/A
14b SOMAH True-up (July - Dec. 2020) ⁴	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,820,202	N/A
14c SOMAH 2016-2019 Underallocation	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$12,604,205	N/A
14d Prior Year SOMAH True-up (Jan - Sept) ⁵	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$790,623	N/A
14e Prior Year SOMAH True-up (Oct - Dec) ⁶	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$100,486	N/A
14f DAC SASH	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,030,000	\$1,030,000	\$1,030,000	\$1,030,000	\$1,030,000	N/A
14g DAC-GT	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,113,700	\$2,113,700	\$866,297	\$866,297	\$0	N/A
14h CS-GT	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$390,500	\$390,500	\$1,242,248	\$1,242,248	\$0	N/A
15 Net GHG Revenues (Line 8 + Line 13 + Line 14)	(\$102,074,500)	(\$82,503,131)	(\$198,257,132)	(\$160,211,922)	(\$98,882,500)	(\$99,544,830)	(\$53,456,792)	(\$50,096,119)	(\$82,609,840)	(\$89,132,057)	(\$93,208,762)	(\$90,900,517)	(\$89,138,381)	(\$87,728,273)	(\$97,709,211)	(\$86,104,501)	(\$96,031,467)	N/A
16 GHG Revenues to be Distributed in Future Years	\$0	\$0	\$11,037,250	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	N/A
17 Net GHG Revenues Available for Customers in Forecast Year (Line 15 + Line 16)	(\$102,074,500)	(\$82,503,131)	(\$147,219,882)	(\$160,211,922)	(\$98,882,500)	(\$99,544,830)	(\$53,456,792)	(\$50,096,119)	(\$82,609,840)	(\$89,132,057)	(\$93,208,762)	(\$90,900,517)	(\$89,138,381)	(\$87,728,273)	(\$97,709,211)	(\$86,104,501)	(\$96,031,467)	N/A
18 GHG Revenue Returned to Eligible Customers																		
19 ETE Customer Return ^{7,8}	\$0	\$0	\$1,583,553	\$0	\$1,384,559	\$0	\$4,238,010	\$2,599,416	\$760,200	\$668,775	\$669,179	\$468,650	\$468,650	\$426,781	\$426,782	\$838,559	\$838,557	N/A
20 Small Business Volumetric Return	\$0	\$0	\$10,882,219	\$11,533,823	\$6,954,493	\$13,247,750	\$3,648,498	\$4,062,057	\$2,701,990	\$3,100,138	\$3,638,944	\$4,330,020	\$2,798,095	\$2,968,472	\$2,901,607	\$2,892,643	\$1,656,571	N/A
21 Residential Volumetric Return	\$0	\$0	\$45,915,031	\$35,982,852	\$31,314,308	\$39,050,635	\$0	\$1,767,675	\$0	(\$1,550)	\$0	(\$3,002)	\$0	(\$23)	\$0	\$0	\$0	N/A
22 Subtotal ETE + Volumetric Returns	\$0	\$0	\$58,480,803	\$47,116,675	\$39,653,361	\$53,298,405	\$7,886,508	\$6,426,148	\$3,462,190	\$1,765,363	\$4,308,123	\$4,795,658	\$3,266,745	\$3,395,230	\$3,328,389	\$3,731,203	\$2,495,128	N/A
23 Number of Households Eligible for the California Climate Credit ⁹	-	-	1,224,253	1,306,520	1,224,251	1,313,989	1,306,630	1,319,006	1,314,398	1,309,248	1,325,052	1,340,879	1,370,670	1,351,509	1,352,478	1,325,066	1,351,533	N/A
24 Pre-Household Semi-Annual Climate Credit ¹⁰ (0.5 x (Line 17 + 22) x Line 23)	\$0.00	\$0.00	\$36.24	\$36.24	\$23.99	\$23.99	\$17.44	\$17.44	\$30.11	\$30.11	\$33.55	\$33.50	\$31.32	\$31.32	\$34.89	\$32.28	\$34.60	N/A
25 Revenue Distributed for the Climate Credit (2 x Line 23 x Line 24)	\$0	\$0	\$88,739,079	\$94,702,116	\$58,729,139	\$79,138,793	\$45,570,284	46,001,913	\$79,147,651	\$78,837,566	\$88,900,639	\$89,838,912	\$85,871,636	\$84,658,530	\$94,380,823	\$85,546,235	\$93,536,339	N/A
26 Revenue Balance (Line 15 + Line 22 + Line 25)	N/A	(\$82,503,131)	N/A	(\$18,393,131)	N/A	(\$31,892,368)	N/A	\$4,334,942	N/A	(\$6,529,128)	N/A	\$3,734,063	N/A	\$325,486	N/A	\$3,172,937	N/A	N/A

¹ Includes 50% of 2013 allowance revenues and expenses.

² Recorded data reflects actual data for January 2020 to September 2020 (through the third quarter) and updated forecasted data for October 2020 to December 2020 (fourth quarter).

³ Forecasted Outreach & Administrative Expenses are the forecasted expenses (from Template D-3) adjusted for any forecasted prior year's under/over collection in the GHGCDMA and GHGACMA.

⁴ The 2017 recorded column includes the MultiFamily Program set aside consistent with the March 18, 2016 Administrative Law Judge ruling in the Development of a Successor to Net Energy Metering proceeding (Rulemaking 14-07-002). The 2018 forecasted column represents the October 24, 2017 ALJ email ruling directing SOG&E to file an updated calculation of the amount attributable to Senate Bill 92.

⁵ SOG&E's forecasted 2016 ETE Customer Return represents Prior Year ETE Customer Return of \$2,968,113 to be distributed in 2016, as well as the 2016 forecasted ETE Customer Return of \$1,269,887.

⁶ In accordance with the methodology approved in D. 15-01-024, the ETE Customer Return forecast for 2017 includes: a) 2016 ETE return, b) the 9-1-16 FR&U for applied to the 2016 ETE return, and c) the 9-1-13 FR&U for ETE returns from 2013 to 2016.

⁷ In accordance with D.15-01-024, the 2018 ETE Customer Return forecast includes the 2016 revenue returned to ETE customers and will be updated with the November update.

⁸ Due to timing in receiving approval of D.15-03-015, the 2015 April residential CCC given was based on the authorized 2014 residential CCC of \$36.24 per household. The October residential CCC was based on the authorized 2015 residential CCC of \$33.59 per household.

⁹ Includes actual GHG allowance auction revenues for July-September and a forecast for October through December 2020.

¹⁰ SOMAH 2020 true-up is based on actual GHG allowance auction revenues for Jan through June 2020.

¹¹ October through December prior year SOMAH True-up is two years in arrears due to the timing of actual GHG auction revenues.

Template D-2: Annual GHG Emissions and Associated Costs

Line	Description	2013		2014		2015		2016		2017		2018		2019		2020		2021	
		Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ^b	Forecast	Recorded
1	Direct GHG Emissions (MTCO ₂ e)																		
2	Utility Owned Generation (UOG)																		
3	Trading Agreements																		
4	Energy Imports (Specified)																		
5	Energy imports (Unspecified)																		
6	RPS Adjustment																		
6.5	2013 Under-Reported True-Up (Section 95858 of C&T Regulation) ¹									(75,877)									
7	Qualifying Facility (QF) Contracts																		
7	Contract with Financial Settlement																		
8	Subtotal																		
9	Indirect GHG Emissions (MTCO ₂ e)																		
10	CASQ Market Purchases																		
11	Contract Purchases																		
12	Subtotal																		
13	Total Emissions (MTCO ₂ e)	5,596,398	5,678,547	5,473,713	5,590,681	4,811,519	5,013,119	4,203,567	4,545,471	4,243,313	4,521,153	3,879,511	4,347,722	3,778,406	4,600,980	3,899,232	3,072,707	3,322,674	
	Direct GHG Costs ²																		
14	Proxy GHG Price (\$/MT)	\$17.35	\$13.57	\$14.44	\$12.04	\$12.09	\$12.79	\$13.13	\$12.84	\$13.23	\$14.57	\$15.63	\$15.31	\$16.35	\$17.28	\$18.29	\$17.10	\$17.12	
15	GHG Costs (\$)																		
16	Direct GHG Costs ²																		
16.5	Direct GHG Costs True-Up ³																		
17	Direct GHG Costs - Financial Settlement																		
18	Indirect GHG Costs																		
19	Previous Year's Forecast Reconciliation ⁴	N/A	N/A	\$0	\$0	(\$25,881,702)	(\$35,475,620)	(\$7,355,343)	(\$16,295,922)	(\$7,874,873)	(\$21,964,804)	(\$8,449,696)	(\$8,449,696)	\$13,474,478	\$3,474,478	\$10,297,847	\$10,297,847	(\$21,504,099)	
20	Total Costs (\$)	\$89,750,005	\$61,221,829	\$61,715,000	\$64,361,474	\$32,289,561	\$24,934,218	\$47,848,837	\$39,973,966	\$48,264,166	\$39,814,470	\$52,187,054	\$55,661,532	\$65,251,423	\$75,549,269	\$81,614,800	\$60,110,701	\$35,380,077	
21	Forecast Variance ⁵ (\$)	N/A	(\$28,528,177)	N/A	\$2,646,474	N/A	(\$7,355,343)	N/A	(\$7,874,873)	N/A	(\$8,449,696)	N/A	\$13,474,478	N/A	\$10,297,847	N/A	(\$21,504,099)	N/A	

¹In October of 2018, SDG&E recognized a downward adjustment of the under-reported emissions from 2013 and recorded this adjustment in its updated 2017 emissions. The downward adjustment follows section 95858 of the Cap-and-Trade regulation which provides a formula for calculating compliance obligations for under-reporting in a previous compliance period. The result of that formula was a compliance obligation reduction of 75,877 MT.

²Direct cost forecasts for 2013 and 2014 reflect cash accounting for regulatory purposes. Direct costs for 2017 forward include true-ups.

³SDG&E adopted an approach (as per D.19-04-Q16) that splits Direct GHG costs from prior period true-ups of Direct Costs. This row captures the true-up costs that necessarily need to be added to the Direct Costs prior to recording.

The 2019 Recorded True-up includes an off-cycle \$155,105 true-up to finalize SDG&E's 2018 emission volumes.

⁴The 2013 forecasted variance was not included in 2014 forecast reconciliation. The 2015 forecasted reconciliation includes both 2013 and 2014 forecast variance amounts. In addition, due to updates to recorded 2013 and 2014 amounts, this figure has been updated.

⁵Also reflects adjustment for shift in regulatory accounting from cash to accrual

⁶Recorded data is through September of 2020 and forecast for October-December 2020, all of which are subject to change when actualized or verified.

Template D-3: Detail of Outreach and Administrative Expenses

Line Description	2013		2014		2015		2016		2017		2018		2019		2020		2021	
	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded	Forecast	Recorded ¹	Forecast	Recorded
1 Utility Outreach																		
2 Customer Call Center	-	N/A	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Other (Consultant) ^{2,5,6}	52,500	N/A	-	72,040	-	(19,541)	-	-	-	-	-	-	18,811	-	(18,811)	-	-	-
4 Subtotal Outreach	52,500	-	-	72,040	-	(19,541)	-	-	-	-	-	-	18,811	-	(18,811)	-	-	-
5 Utility Administrative																		
6 General Program Management	-	N/A	-	-	-	18,622	-	-	-	5,600	-	-	-	-	-	-	-	-
7 IT/Billing System Enhancements	425,000	N/A	-	-	-	38,260	-	30,912	-	-	-	-	-	-	-	-	-	-
8 IT Program Management and Oversight	-	N/A	-	14,842	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Marketing - SDG&E (email, bill insert) ³	-	N/A	35,000	33,699	35,000	51,342	35,000	25,512	35,000	26,809	47,500	23,425	47,500	3,291	59,000	60,865	59,000	-
10 Other ⁴	-	N/A	12,500	12,500	12,500	-	12,500	-	12,500	2,361	-	-	-	-	-	-	-	-
11 Subtotal Administrative	425,000	-	47,500	61,041	47,500	108,224	47,500	56,424	47,500	34,770	47,500	23,425	47,500	3,291	59,000	60,865	59,000	-
12 Utility Outreach and Administrative Expenses (Line 4 + Line 11)	477,500	N/A	47,500	133,081	47,500	88,683	47,500	56,424	47,500	34,770	47,500	23,425	47,500	22,103	59,000	42,054	59,000	-
13 Additional (Non-Utility) Statewide Outreach	750,000	N/A	140,000	750,000	140,000	-	140,000	-	140,000	-	140,000	-	-	-	-	-	-	-
14 Total Outreach and Administrative Expenses (Line 12 + Line 13)	1,227,500	-	187,500	883,081	187,500	88,683	187,500	56,424	187,500	34,770	187,500	23,425	47,500	22,103	59,000	42,054	59,000	-

¹ Recorded data reflects actual data for January 2020 to September 2020 (through the third quarter) and updated forecasted data for October 2020 to December 2020 (fourth quarter).

² 2013 forecasted expenses were revised from D.13-12-041 to shift the \$52.5k for Targetbase costs from admin to outreach pursuant to Resolution E-4611.

³ 2014 forecasted expenses were revised from D.13-12-041 to shift the \$35k for marketing from outreach to administration pursuant to Resolution E-4611.

⁴ Direct labor costs associated with: (1) Subsequent pricing and credit updates to the billing system; (2) customer eligibility review and verification process; (3) Manual set-up and maintenance required for the identified EITE customers; and (4) Monitoring of check cutting activities related to Net Energy Metering customers.

⁵ Bill inserts and emails costs of \$19,540 booked to GHGCOEMA in April/May/December 2014 were transferred to GHGACMA in October 2015.

⁶ Bill inserts and emails costs of \$18,811 booked to GHGCOEMA in October/November/December 2019 were transferred to GHGACMA in 2020.

Template D-4: Costs and Revenues by Rate Schedule

Rate Schedule (A)	Status (Open/Closed) (B)	Bundled Customers				Unbundled Customers				Total
		Forecast MWh Sales (MWh) (C)	Forecast GHG Revenue Req ¹ (\$) (D)	Rate Impact (\$/kWh) ² (E)	Forecast GHG Revenue (\$) (F)	Forecast MWh Sales (MWh) (G)	Forecast GHG Revenue Req ¹ (\$) (H)	Rate Impact (\$/kWh) ² (I)	Forecast GHG Revenue (\$) (J)	Forecast GHG Revenue (\$) (K=F+J)
Residential		6,062,419	\$13,555,498	0.00224	\$92,987,454	42,544	N/A	N/A	\$548,886	\$ 93,536,340
DR	Open									
DR-LI	Open									
TOU-DR1	Open									
TOU-DR2	Open									
TOU-DR	Open									
DM	Closed									
DS	Closed									
DT	Closed									
DT-RV	Open									
DR-TOU	Closed									
DR-SES	Open									
EV-TOU	Open									
EV-TOU2	Open									
EV-TOU-5	Open									
Small Commercial		2,223,499	\$ 4,200,365	0.00189	\$ 1,664,517	38,947	N/A	N/A	\$ 37,064	\$ 1,701,581
TOU-A3	Open									
TOU-A2	Open									
TOU-A	Open									
A-TC	Open									
TOU-M	Open									
UM	Open									
Med/Large C&I³		5,915,422	\$ 13,302,626	0.00225	\$ 367,804	3,525,242	N/A	N/A	\$ 404,999	\$ 772,803
AL-TOU	Open									
AL-TOU2	Open									
DG-R	Open									
A6-TOU	Open									
OL-TOU	Open									
VGI	Open									
Public GIR	Open									
Agricultural		298,011	\$ 474,502	0.00159	\$ 20,744	24,649	N/A	N/A	\$ -	\$ 20,744
TOU-PA3	Open									
TOU-PA2	Open									
TOU-PA	Open									
PA-T-1	Open									
Streetlighting		79,522	\$ 116,693	0.00147	\$ -	465	N/A	N/A	\$ -	\$ -
LS-1	Open									
LS-2	Open									
LS-3	Closed									
OL-1	Open									
OL-2	Open									
DWL	Open									
System Total		14,578,874	\$ 31,649,684	0.00217	\$ 95,040,519	\$ 3,631,847	N/A	N/A	\$ 990,949	\$ 96,031,468

¹In accordance with Section 2.5. of the Amended Joint Investor-Owned Utility Cap-and-Trade Greenhouse Gas Revenue Allowance Return Implementation Plan approved in D.13-12-003, any disparity between the forecast of cap-and-trade costs incorporated into rates and actual cap and-trade costs incurred will be captured as part of the larger ERRR true-up process. SDG&E will true-up total ERRR balances either through its Annual Regulatory Account update filing (pursuant to D.09-04-021) or through the ERRR Trigger Mechanism (pursuant to D.07-05-008). Therefore, the GHG revenue requirement included in column D does not include a GHG cost reconciliation.

²Rate impacts are based on customer class.

³The VGI and Public GIR rates are based on the Medium and Large Commercial and Industrial rate.

Template D-5: History of Revenue, Costs, and Emissions Intensity

Line	Information	2013	2014	2015	2016	2017	2018	2019	2020 (forecast)	2021 (forecast)
1	Total GHG Costs (\$)	\$61,221,829	\$64,361,474	\$60,409,838	\$56,269,888	\$61,779,274	\$64,111,229	\$72,074,792	\$49,812,854	\$56,884,176
2	Total GHG Revenues (\$)	(\$82,453,505)	(\$76,756,698)	(\$79,929,224)	(\$81,558,628)	(\$92,539,677)	(\$93,727,555)	(\$104,156,909)	(\$106,782,171)	(\$115,836,437)
3	Emissions Intensity (MTCO2e/MWh) *	0.322	0.284	0.269	0.242	0.243	0.241	0.268		

* SDG&E's Emissions Intensities include GHG benefits from all SDG&E RPS-eligible resources except for Portfolio Content Category 3 (PCC3) RECs. Accordingly, GHG benefits from SDG&E's PCC0, PPC1 and PCC2 category resources are included in the calculation above. Note that this calculation differs from the one described in the new Power Source Disclosure regulation, which will appear in Power Content Labels starting September 2021.